

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF HAWAII

In the Matter of the Application of )  
)  
PUBLIC UTILITIES COMMISSION )  
)  
Instituting a Proceeding to Investigate the )  
Implementation of Feed-in Tariffs. )  
)  
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DOCKET NO. 2008-0273

PUBLIC UTILITIES  
COMMISSION

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FILED

**THE SOLAR ALLIANCE'S  
INFORMATION REQUESTS TO HAWAIIAN ELECTRIC COMPANY AND  
THE CONSUMER ADVOCATE REGARDING THEIR  
JOINT PROPOSAL ON FEED-IN TARIFFS**

**AND**

**CERTIFICATE OF SERVICE**

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for The Solar Alliance

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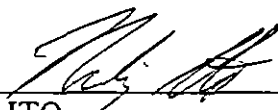
**THE SOLAR ALLIANCE'S  
INFORMATION REQUESTS TO HAWAIIAN ELECTRIC COMPANY AND  
THE CONSUMER ADVOCATE REGARDING THEIR  
JOINT PROPOSAL ON FEED-IN TARIFFS**

Pursuant to the Commission's Order Approving the HECO Companies' Proposed  
Procedural Order, as Modified, filed on January 20, 2009, The Solar Alliance hereby submits the  
following Information Requests to the HECO Companies and the Division of Consumer  
Advocacy.

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Respectfully submitted.

DATED: Honolulu, Hawaii, *Jan. 28,* 2009.

  
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RILEY SAITO

for The Solar Alliance

**DOCKET NO. 2008-0273**

**SOLAR ALLIANCE'S  
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**INSTRUCTIONS:**

In order to expedite and facilitate Solar Alliance's ("SA") review and analysis in the above matter, the following is requested:

1. For each response, the HECO Companies and the Consumer Advocate ("HECO/CA") should identify the person who is responsible for preparing the response as well as the witness who will be responsible for sponsoring the response should there be an evidentiary hearing;
2. Should HECO/CA claim that any information is not discoverable for any reason:
  - a. State all claimed privileges and objections to disclosure;
  - b. State all facts and reasons supporting each claimed privilege and objection;
  - c. State under what conditions HECO/CA is willing to permit disclosure to SA (e.g. protective agreement, review at business offices, etc.); and
  - d. If HECO/CA claims that a written document or electronic file is not discoverable, besides complying with subparagraphs 2a-c, identify each document or electronic file, or portions thereof, that HECO/CA claims are privileged or will not be disclosed, including the title or subject matter, the date, the author(s) and the addressee(s).

- SA-IR-1 Pls. confirm that it is HECO/CA's position that a generator-customer may choose to either sell gross outputs or gross net outputs to the HECO Companies. If that is correct, please explain in detail why a eligibility for FiTs and interconnection requirements for a generator-customer who chooses to sell gross net outputs still will be determined by the generator-customer's gross outputs?
- SA-IR-2 Pls. confirm whether or not HECO/CA in its proposal is proposing the elimination of the HECO Companies Net Metering Program as part of its FiTs proposal.
- If yes, explain why it is necessary to eliminate the net metering program. Why can't FiTs and net metering co-exist as programs that support the deployment of renewable energy in Hawaii?
  - If net metering is eliminated, please explain in detail how HECO/CA proposes to makeup the proposed 127 MW of net metered energy by 2030 as stated in Exhibit A of the Energy Agreement?
- SA-IR-3 Pls. explain how the interconnection process will be expedited and standardized when DG penetration at the circuit level exceeds 10%?
- SA-IR-4 Pls. explain the rationale as to why the utility should received the REC from the renewable energy generator under FiTs.
- Isn't the utility just buying the energy under the FiT program?
  - If the utility also wants to purchase the REC, what is the price that HECO/CA is proposing that the HECO Companies pay for it?
  - Will this price be included as an adjustment to the FiT rate?
  - Even if HECO/CA alleges that the REC is not a cost, if it has a value, shouldn't the HECO Companies compensate the renewable energy generator to receive it? If not, why not?
  - Is it HECO/CA's position that these RECs do not have a value?
- SA-IR-5 Please explain in detail the rationale for the HECO Companies to establish the PV Host Program?
- Is the purpose of the PV Host Program to have the HECO Companies compete with current PV companies for jobs, sites, customers, etc.?
  - Is it HECO/CA's position that the current PV companies are not adequately meeting the demand for PV systems?

- c. If a PV system under the HECO Companies PV Host Program is utility owned or utility affiliated owned, wouldn't this create a conflict of interest and/or unfair advantage to the utility and/or utility affiliated? If not, why not?

SA-IR-6 Please explain in detail how HECO/CA came up with the eligibility requirements for PV systems. What is the justification for the system size caps?

CERTIFICATE OF SERVICE

The foregoing Information Request to Hawaiian Electric Company and the Consumer Advocate regarding their Joint Proposal on Feed-in Tariffs was served on the date of filing by hand delivery or electronically transmitted to the following Parties:

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2 Copies  
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DATED: Honolulu, Hawaii, *January 28,* 2009.

  
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for The Solar Alliance